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November 3, 2014

Via ECF

The Honorable Lorna G. Schofield
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Cummings v. Soul Train Holdings, LLC*, No. 14-cv-00036 (LGS)
Motion For Extension of Time to Complete Discovery

Dear Judge Schofield:

I represent the plaintiff, Mr. Jeremiah Cummings. This letter is to request an extension of time to allow completion of discovery by the parties of record.

To date, one previously named defendant has been dismissed from the action based on preliminary discovery. A motion to dismiss by the remaining defendants is pending before the Court. According to the current case management schedule, fact discovery closes on November 3, 2014 while expert discovery must be completed by December 3. The parties have so far exchanged interrogatories and requests for production of documents.

The defendants substituted new counsel on August 26, 2014. In a telephone conversation with one of the new attorneys, Ms. Rita Haeusler, on September 26, 2014 she mentioned that her firm was still awaiting completion of file transfer from defendants' previous attorneys. Ms. Haeusler and I discussed an extension of the schedule to permit completion of additional discovery, supplementation of discovery responses provided by the previous counsel and the filing of any necessary discovery motions. Subsequently, Hughes Hubbard has indicated the firm has no plan to request extension of the discovery deadlines. The firm has however also not opposed this course of action.

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The undersigned counsel therefore requests that the Court grant an extension of time to complete discovery and an amendment to the current case management schedule as reflected below.

Action	Current Deadline	Proposed Reset Date
Fact discovery closes (includes depositions and requests for admissions)	November 3, 2014	February 10, 2014
Expert discovery closes	December 3, 2014	March 10, 2014
Status conference	December 10, 2014	March 17, 2014
Cutoff for filing summary judgment motions	September 30, 2014	April 10, 2014

If the Court determines a conference is necessary, the undersigned respectfully requests permission to participate by telephone.

Respectfully requested,

/s/ Deanna L. Baxam

Deanna L. Baxam (*pro hac vice*)
Baxam Law Group, LLC

cc: Hughes, Hubbard & Reed, LLP
Michael Salzman, Esq.
Rita Haeusler, Esq.
Webster McBride, Esq.
Alex Spjute, Esq.